

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

---

POULAT ALAYEV, Derivatively on behalf of  
UNPA GROUP LIMITED,

Civil Action No. 22CV1609

Plaintiffs,

**AFFIRMATION IN  
SUPPORT**

-against-

ARKADY (ARIHAY) KAIKOV, ZHENISBEK  
BAKBERGEN, NIGARA KHIDOYATOVA,  
ANDRE STECKLER, STEWARTON LIMITED  
and UNPA GROUP LIMITED,

Defendants.

---

Donald J. Weiss, an attorney duly admitted to the Eastern District Court of New York, states as follows :

1. I am the attorney for plaintiff in the above captioned action.
2. This action was commenced pursuant to 28 U.S.C. §1332 as the amount in controversy exceeds the sum of \$75,000, exclusive of interest and costs and is between citizens of different States.
3. As demonstrated by the affidavit of service filed herein, defendant ARKADY (ARIHAY) KAIKOV (“Kaikov”) was served by substituted service, with service having been completed with the required mailing on May 12, 2022.
5. Kaikov’s time to answer or otherwise move with respect to the complaint has expired.
6. Kaikov has not answered or otherwise moved with respect to the complaint and the time to do so has not been extended.
7. Kaikov is not an infant or incompetent, nor is he presently in the military service of the United States, as documented by the attached non-military affidavit.
8. This action seeks to recover damages from defendant as the result of defendant’s breach of fiduciary duty and conversion.

WHEREFORE, the plaintiff requests that the default of defendant ARKADY (ARIHAY) KAIKOV be noted and a certificate of default issued.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief, that the relief claimed is justly due to plaintiff, and that no part thereof has been satisfied.

Dated: Deer Park, New York  
June 10, 2022

Donald J. Weiss  
Donald J. Weiss